

### REMARKS

Claims 1-14 were submitted for examination, and all have been rejected. Reconsideration and reexamination of the above-referenced patent application is respectfully requested.

#### Rejection Under 35 USC §102 Over Moore

Claims 1-14 have been rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 6,097,611 of Samaras et al. ("Samaras") in view of U.S. Patent No. 4,471,408 of Martinez ("Martinez").

Applicants respectfully submit that Samaras and Martinez fail to teach or suggest Applicants' invention as claimed, including, for example, Applicants' claimed limitation of "an integrated circuit (IC) package comprising... an encoded region to provide information based upon selective deposition of solder balls electrically coupled to the ground line" as set forth in claim 1.

It is stated in the outstanding office action that Martinez discloses an integrated circuit in which pins are selectively bent or broken to encode information. A careful reading of Martinez reveals, however, that the pins selectively bent or broken in Martinez are not the pins of the integrated circuit package but rather the pins of a separate *piggyback device* that is clipped to the top of the package. Samaras discloses a BGA package including solder balls formed directly on the underside of the integrated circuit package. Applicants respectfully submit, therefore, that Samaras may not be combined with Martinez in the manner suggested in the outstanding office action.

Moreover, Applicants respectfully submit that even if combined, these references do not teach or suggest Applicants' invention, as set forth in claim 1, because, for example, there is no teaching or suggestion of how one skilled in the art would attach the piggyback device of Martinez to the surface of the BGA package of Samaras with any reasonable expectation of making top to the solder balls on underside of the BGA

package. One skilled in the art would further recognize that such a piggyback device, if extended to the underside of the BGA package, would likely interfere with the electrical coupling between the BGA device and the substrate to which it is soldered (item 50 in Figure 6 of Samaras).

Therefore, Applicants respectfully submit that the combination of Samaras and Martinez does not teach or suggest Applicants' invention as set forth in independent claim 1, upon which claims 2-7 are dependent. In addition, note that the remaining independent claims set forth similarly patentable limitations.


### Conclusion

Applicants respectfully submit that the now pending claims are in condition for allowance.

Respectfully submitted,

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**APPENDIX A**  
**VERSION OF SPECIFICATION AND CLAIMS**  
**WITH MARKINGS TO SHOW CHANGES MADE**

**IN THE CLAIMS**

No changes have been made to the claims.